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NHTSA-01-10526-1

DEPT. OF TRANSPORTATION
DOCKETS

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Registered Importer R-90-006

Petition For Import Eligibility Determination**IAW 49 CFR 593.5 (A) (1)**

To:
Administrator
National Highway Traffic Safety Administration
Room 6111
400 7th St., S.W.
Washington, DC 20590
Attn.: NEF-32 Import Eligibility

5/30/01

Dear Mr. Loy:

The following is the basis for this petition:

Part 593.6(a) (1)

The vehicle for which a determination is sought is 1999 F 355 series Ferrari. We have examined the recall campaigns and we have found that there were no listings for these vehicles. All vehicle reports will have a recall campaign search included with them at the time of submission. All recalls will be corrected during conversion.

Part 593.6(a) (2)

The vehicle which is substantially similar to the petition vehicle is the US version.

Part 593.6(a) (3)

The vehicle which we believe to be substantially similar is manufactured for sale in the USA and it was certified to meet all applicable FMVSS in effect at the time

of manufacture. The non-conforming model was not listed on the accepted DOT list in 55 FR 219, pp219, 47418ff, or the updates that have been published. The differences between the USA model and the non-certified model are very minor and have been outlined in this petition.

Part 593.6(a) (4)

Since a USA companion model exists, we seek your determination that our petition vehicle is substantially similar to the USA model and therefore is eligible for importation and modification in the "substantially similar" category. We have examined the printed text from the dealers both in the USA and in Europe and we have compared the microfiche parts list from Europe and the USA to determine both what differences exist and what parts will be necessary to bring our non-conforming model into conformance with all applicable FMVSS in effect at the time of manufacture. These differences and changes have been outlined in the following examination of each applicable FMVSS.

Part 593.6(a) (5)

The following outline will show that our non-conforming vehicle was originally manufactured to conform to the FMVSS in many areas in the same manner as its US companion model, many of the concerned parts have the same parts numbers as the USA model. In all areas that have to be modified the parts will be supplied by the manufacturer. The modifications to this vehicle do not concern the basic structure; only easily removable and available parts.

FMVSS 101

Except as shown below, all controls and displays meet this FMVSS in the same manner as the USA model.

a. The word "BRAKE" must be added to the dash in place of the international ECE warning symbol.

b. The speedometer must be changed to one whose face shows MPH. The world speedometers are in Kilometers.

All other placards are changed in the dash for ease of identification by the driver. In most cases the entire instrument cluster is changed to the USA part. (1618193)

FMVSS 102

The markings, starter interlock, shifting pattern, and brake effect are identical to those in the U.S. model.

FMVSS 103

The windshield defogging and defrosting systems are identical to those in the U.S. model.

FMVSS 104

The windshield wiping and washing systems are identical to those in the U.S. model.

FMVSS 105

The hydraulic brake system and the parking brake system are identical to those in the U.S. model.

FMVSS 106

The brake hoses are identical to those in the U.S. models.

FMVSS 108

The following modifications must be made to fully meet this FMVSS:

- a. Install U.S. model headlamps and front sidemarker lights are added to the bumper.(133082 , 133083, 2-147563)
- b. Install U.S. model taillamp assemblies which incorporate rear sidemarker lights are added to the bumper. (2-140594)
- c. Install the U.S. model high-mounted stop light assembly if necessary.
(140568)

FMVSS 109

This vehicle came equipped with tires that bear the "DOT" symbol.

FMVSS 110

A tire placard must be installed to meet this FMVSS requirement.

FMVSS 111

The driver's inside and outside rearview mirrors meet this FMVSS. However, the passenger's rearview outside mirror must be changed to the U.S. companion model part to meet the requirements. (64488710) The mirror can also be etched with the language required.

FMVSS 113

The hood latch system is identical to the one used on the U.S. model.

FMVSS 114

The vehicle must have the key microswitch and the warning buzzer added to meet this FMVSS. A diagram of this system will be included with the final report.

CFR 565

A "Vehicle Identification Plate" must be added near the left windshield post and a reference and certification label must be added in the left front door post area to meet this FMVSS. Copies of all labels will be included in the final report.

FMVSS 116

The vehicle came equipped with DOT brake fluid and the top of the master cylinder is labeled with the DOT information.

FMVSS 118

A relay must be added to the power window system so that the windows will not operate with the ignition off. A diagram will be included in the final report to show the wiring. Most of these vehicles have these defeat devices as standard equipment.

FMVSS 124

The accelerator control system is identical to the U.S. model.

FMVSS 201

The components subject to this FMVSS are identical to those in the U.S. companion model.

FMVSS 202

This vehicle came equipped with head restraints that are identical to those on the U.S. model.

FMVSS 203

N/A when FMVSS 208 is met. Conforms to S5.1 of FMVSS 208. Impact for steering controls systems.

FMVSS 204

The steering shaft on this vehicle are energy absorbing and is identical to that used on the U.S. model.

FMVSS 205

The glass and glazing materials used on this vehicle are identical to those used on the U.S. model. They are clearly labeled with DOT AS-1 or DOT AS-2.

FMVSS 206

The door locks and retention components are identical to the USA model.

FMVSS 207

The seating system in this vehicle is identical to that used in the U.S. model.

FMVSS 208

This vehicle is equipped with a seat belt warning lamp that is identical to that used on the U.S. model. However, an audible warning buzzer must be added and wired to the seatbelt latch to make this system meet this FMVSS. A diagram of the buzzer and wiring changes will be included with the final report.

The passive restraint systems used in these vehicles consist of dual front airbags and knee bolsters. They also have combination lap and shoulder belts at the out board front seating positions. These manual systems are automatic, self tensioning and are released by means of a single red push-button.

All vehicles entering the USA must be inspected to confirm that the systems bear the US part # on the airbags (156693,64343500), control unit (163826), sensors and seatbelts and that the knee bolster (64386501) has been installed. Some parts coming from European countries may need to be changed due to varying regulations. However, Gulf states car have US systems as standard equipment.

FMVSS 209

The seatbelt labels are identical to those on the U.S. model and they meet this FMVSS requirement.

FMVSS 210

The seatbelt anchorages are identical to those of the U.S. model.

FMVSS 212

The windshield intrusion zone and the parts and engineering thereof are identical to those of the U.S. model.

FMVSS 214

Doorbars in this vehicle are identical to those in the USA model. All vehicles that enter the country must be inspected for compliance with this regulation due to varying standards throughout European communities. The replacement bars are available from the manufacturer. (#JKF355) An engineering report will be included with the final report, as has been provided with the 1998-1997 reports. These vehicles are in compliance with this regulation.

49 CFR PART 581

The bumpers and the support structure for the bumpers on these vehicles are the same as U.S. model. We do added small braces for support of the corner area's. Our enhanced crash programs have shown that there "could be" a support problem. To avoid any problems in the future we have reinforced these area's.

FMVSS 216

The body of these vehicle is identical to that of the U.S. model.

FMVSS 219

The windshield intrusion and the parts or components thereof, are identical to those of the U.S. model.

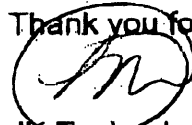
FMVSS 301

The fuel system in this vehicle are identical to that of the U.S. model. Fuel spillage problems are controlled by the evaporative system that was installed by the factory for the EPA requirements. These evaporative systems have a rollover and check valve incorporated in their design.

FMVSS 302

This vehicle is equipped with interior materials that are identical to those used on the U.S. model.

Thank you for your attention,



JK Technologies, LLC.

Correction - 8/15/01